

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION

FILED 2/23  
FEB 24 PM 2:44  
U.S. DISTRICT COURT  
N.D. OF ALABAMA

UNITED STATES OF AMERICA )

v. )

CR 00-S-422-S

ERIC ROBERT RUDOLPH )

GOVERNMENT'S REQUEST FOR RECIPROCAL DISCOVERY

Comes Now the United States of America, by and through its counsel Alice H. Martin, United States Attorney and William R. Chambers, Jr., Assistant United States Attorney and respectfully files this Request for Reciprocal Discovery pursuant to Federal Rule of Criminal Procedure 16(b)(1)(B) and (C) and in support thereof submits the following:

The United States has heretofore in discovery provided the defendant with copies of reports of examinations and tests performed in this case pursuant to Rule 16(a)(1)(F) as requested. As the defendant requested disclosure under Rule 16(a)(1)(F) and the United States has complied, the United States hereby requests reciprocal disclosure of any results and/or reports of any physical or mental examinations and of any other scientific tests and/or experiments that are in the possession, custody or control of the defendant and which the defendant intends to use in his case-in-chief at trial or intends to call the witness who prepared the report and the report relates to the witness's testimony pursuant to Rule

16(b)(1)(B).

On January 30, 2004, the defendant requested disclosure of materials related to the testimony of government witnesses under Federal Rules of Evidence 702, 703, and 705 pursuant to Rule 16(a)(1)(G). On February 23, 2004, the United States filed with the Court and provided the defendant with the identities and summaries of the expected testimony of expert witnesses the government intends to use under Federal Rules of Evidence 702, 703, and 705 pursuant to the defendant's request and Federal Rule of Criminal Procedure 16(a)(1)(G). Said summaries provided the defendant with a description of the witnesses' opinions, bases and reasons for those opinions, the witnesses' qualifications and attached pertinent reports of examinations and tests performed by the witnesses. As the defendant requested disclosure of such materials and the government has complied, the United States hereby requests the defendant to provide written summaries of any testimony that the defendant intends to use under Federal Rules of Evidence 702, 703, and/or 705 as evidence at trial.

Respectfully submitted this the 24th day of February, 2004.

ALICE H. MARTIN  
United States Attorney

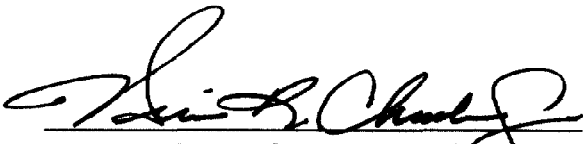
  
WILLIAM R. CHAMBERS, JR.  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing has been served on the defendant by mailing a copy of same this date, February 24, 2004, by First Class, United States mail, postage prepaid, to his attorneys of record,

Mr. Richard Jaffe and Ms. Judy Clarke  
Jaffe, Strickland & Drennan  
2320 Arlington Avenue  
Birmingham, Alabama 35205

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WILLIAM R. CHAMBERS, JR.  
Assistant United States Attorney